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June 4, 2021

VIA ECF

The Honorable Denise Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: *Rothschild Broadcast Distribution Systems, LLC v. Verizon Communication, Inc.*
d/b/a Fios TV, 1:21-cv-04322-DLC

Dear Judge Cote,

We represent Defendant Verizon Communication, Inc. d/b/a Fios TV (“Verizon”) in the above-referenced matter. Pursuant to Rule 1.E of Your Honor’s Individual Rules, we write to respectfully request a 30-day extension of time for Verizon to respond to the Complaint, from the current deadline of June 7, 2021, until July 7, 2021.

We were retained as counsel for Verizon just recently. The requested extension and adjournment will provide us time to investigate Plaintiff’s claims and explore the possibility of an early resolution.

This is Verizon’s first request for an extension of time to respond to the Complaint. Plaintiff consents to this request.

Thank you for your time and consideration of this matter.

Respectfully submitted,

DORSEY & WHITNEY LLP

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BRE:dr

cc: All Counsel of Record (via ECF)